

CORRESPONDENCE CONTROL
OUTGOING LTR NO.**EG&G ROCKY FLATS**

EG&G ROCKY FLATS, INC.

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May 27, 1993

93-RF-6642

J. K. Hartman
Assistant Manager for Transition
and Environmental Restoration
DOE, RFO

Attn: R. H. Birk

RESPONSE TO CDH COMMENTS ON REVISED WORK PLAN FOR OPERABLE UNIT NO. 13
(OU 13) - RLB-256-93

Ref: G. W. Baughman ltr to R. J. Schassburger, Final Phase I RFI/RI Work Plan for
OU 13 - The 100 Area; March 10, 1993, April 26, 1993

The Revised Operable Unit (OU) 13 Work Plan has been submitted to the regulatory agencies per the deadline of March 10, 1993. The Revised Final Phase I RCRA Facilities Investigation/Remedial Investigation (RFI/RI) Work Plan was rejected (above-referenced letter from CDH) pending the resolution of one major and two very minor issues:

- Surficial Soils Sampling Plan;
- Clarification of the radiological survey in paved areas; and
- Delineation of the groundwater plume.

The main point of disagreement is the revised Surficial Soils Sampling Plan. CDH feels that our statistical approach is not valid to meet the Stage I data quality objectives (DQOs). In particular, they feel the number of surficial soil samples is insufficient. CDH would like to require 25 samples per individual hazardous substance site (IHSS). To support this, they photocopied the OU 10 Surficial Soils Sampling Plan and then assumed the same coefficient of variation, which was based on the historical information available from OU 10, to achieve the desired number of samples. Then they reduced the number of samples at some of the smaller IHSSs "based on professional judgement". To be valid, this approach must have historical data on which to calculate a coefficient of variation, but there is no historical data available from OU 13 on which to base any assumptions or statistics. Any methodology must be rigorously applied, not amended arbitrarily. Operable Unit No. 10 data cannot be used to generate OU 13 statistics.

The methods in the Revised Work Plan are based on DOE's SAFER (observational) approach, meet the Stage I DQOs, are statistically sound, and can be performed within current budgets and schedules. EG&G technical staff stands solidly behind our proposed methodology.

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G. T. Ostdiek <i>GT</i>
DATE	6-9-93

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The other two comments are minor and are easily resolved. We have clearly stated that HPGe is reliable only for the measurement of surface radionuclides and we have committed to delineate any plumes of groundwater contamination if they are discovered. We have made changes to the Work Plan to ensure that we are all in agreement.

The most obvious impact of the proposed sampling requirement is budgetary. The additional scope of work (approximately an additional 100 samples plus required blanks, etc.) will cost approximately \$0.5 million in analytic costs alone. The cost of taking the samples (particularly those below paved areas) will also increase greatly — about \$100,000. Secondary will be the impacts to the schedule. Sampling and lab analysis times will each be increased. The failure of the regulatory agencies to approve this Work Plan will result in schedule delays.

EG&G technical staff feels our approach is sound; therefore, I recommend that we have a meeting with the agencies to present our views and prepare for dispute resolution, if necessary. We feel that all previous versions of the Work Plan were submitted in good faith based on the best available information and were approvable. A great number of very thorny issues such as the revision of the Benchmark tables have been resolved. The only real issue that remains is the Surficial Soils Sampling Plan.

Attached is the Response to Comments and the revised text and tables as described in the Response to Comments to be included in DOE's response letter which is due to CDH on or before June 1, 1993. If you have questions regarding this letter, please contact M. F. McHugh of Remediation Project Management at extension 8624.



R. L. Benedetti
Associate General Manager
Environmental Restoration Management

MFM:dmf

Orig. and 1 cc - J. K. Hartman

Attachment:
As Stated

cc:
R. J. Schassburger - DOE, RFO